

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

JEFF BUONGIORNO,

CASE NO.: 9:24-cv-80920-AMC

Plaintiff,

v.

ALEJANDRO MAYORKAS, et al,

Defendants.



**EMERGENCY SUBPOENA DUCES TECUM**

**TO PRODUCE DOCUMENTS OR ELECTRONICALLY STORED INFORMATION**

TO:

MINDY PERKINS

VR SYSTEMS, INC.

3773 Commonwealth Boulevard

Tallahassee, FL 32303

YOU ARE HEREBY COMMANDED, pursuant to Rule 45 of the Federal Rules of Civil Procedure, to produce the following documents or electronically stored information in your possession, custody, or control **on an expedited and emergency basis**:

**Documents and Information Requested:**

1. All records of originating IP addresses associated with Vote-by-Mail (VBM) ballot requests in Pinellas County, Palm Beach County, Miami-Dade County, and Broward County for the 2024 Primary Election and 2024 General Election.

This request includes, but is not limited to:

1. 1. The originating IP addresses associated with each vote-by-mail ballot request in the specified counties.
  2. The date and time of the requests.
  3. Any metadata related to the requests that may identify the method by which the request was made (e.g., online submission).
2. **Any and all records or documentation reflecting the digital origin or source** of the requests for vote-by-mail ballots submitted electronically from **Pinellas, Palm Beach, Miami-Dade, and Broward counties**, including logs of submission dates and associated IP addresses for the **2024 Primary Election** and **2024 General Election**.

**Expedited Date and Location for Production:**

The requested documents and electronically stored information must be produced **no later than October 10<sup>th</sup>, 2024**, and delivered to:

**Jeffrey Buongiorno**  
1901 South Congress Ave  
Boynton Beach, Fl 33426  
561-690-0430  
jeff@etektraining.com

Failure to comply with this subpoena may result in legal penalties under Rule 45(g) of the Federal Rules of Civil Procedure.

**CERTIFICATION**

I, **Jeffrey Buongiorno**, certify that this request is being made in good faith and is reasonably necessary for the purpose of investigating the election processes for the **2024 Primary and General Elections** in the state of Florida, particularly in **Pinellas, Palm Beach, Miami-Dade, and Broward counties**. Given the time-sensitive nature of this investigation, expedited production of the requested documents is essential.

**Dated this Third Day of October**

**Respectfully submitted,**

Signed

Jeff Buongiorno

[Jeff@etektraining.com](mailto:Jeff@etektraining.com)

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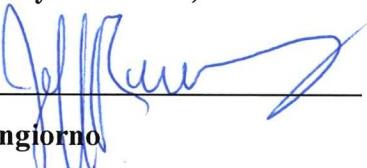
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